



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT  
*Acting Corporation Counsel*

ERIC ARBIZO  
Assistant Corporation Counsel  
Phone: (212) 356-3580  
E-mail: earbizo@law.nyc.gov

November 4, 2024

**By ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2201  
New York, New York 10007

Re: *Saleem Ahmad, et al. v. New York City Health & Hospitals Corp. et al.*  
20-cv-00675 (PAE)

Dear Judge Engelmayer:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent New York City Health & Hospitals Corporation (“H+H”), Ebone Carrington, and Hinnah Farooqi (together, “Defendants”) in the above-referenced action. Respectfully, Defendants request that Defendants’ deadline to file the opening brief for their motion for summary judgment be extended from November 8, 2024 (*see* ECF Doc. No. 142) to November 22, 2024. Defendants request this extension to accommodate Defendants’ counsel’s court schedule during the weeks of November 4<sup>th</sup> and 11<sup>th</sup>, which includes in-person oral argument, depositions, and a settlement conference. Plaintiff consents to this request. As a result of Defendants’ request, Plaintiff requests that the deadline to file opposition to defendants’ motion be moved to December 13, 2024. Plaintiff requests this one-week extension of the resulting deadline to accommodate counsel’s previously scheduled vacation during the week of November 25<sup>th</sup>. Defendants consent to this request. This is the second request to reset the briefing schedule in this matter (*see* ECF Doc. No. 141). The parties previously requested, and the Court granted, a two-week extension of all deadlines (*see* ECF Doc. No. 141), and the first since the parties filed their joint statement of facts (*see* ECF Doc. No. 143).

Accordingly, the parties respectfully request that the briefing schedule for defendants’ motion for summary judgment be adjusted as follows:

- Defendants’ opening brief: November 22, 2024
- Plaintiff’s opposition: December 13, 2024

- Defendants' reply: December 27, 2024

The parties thank the Court for its consideration of this matter.

Respectfully Submitted,

/s/ Eric Arbizo

Eric Arbizo

Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

DENIED. The Court previously granted an extension request for good cause shown. *See* Dkt. 142. A personal vacation and foreseeable work commitments do not constitute good cause, particularly considering that the parties have had notice of their filing commitments since at least the pre-motion conference held on September 20, 2024. *See* Dkt. 140. Accordingly, the Court denies the request. The briefing schedule memorialized in the October 16, 2024 Order remains in place. *See* Dkt. 142. This case is very long standing and there have been numerous requests for extensions or adjournments which the Court has granted.

SO ORDERED.



PAUL A. ENGELMAYER  
United States District Judge

Date: November 7, 2024